

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

**In Re:** :  
**ANDREW H. HON,** : Bankruptcy No. 23-12550-amc  
**Debtor** : Chapter 13  
**Freedom Mortgage Corporation** :  
**Movant** :  
:  
**v.** :  
**ANDREW H. HON** : 11 U.S.C. §362

**and**  
**KENNETH E WEST, ESQUIRE (TRUSTEE)**

**Respondent(s)** :

**CERTIFICATION OF NO ANSWER REGARDING FREEDOM MORTGAGE CORPORATION'S  
MOTION FOR RELIEF FROM STAY (DE 28)**

The undersigned hereby certifies that, as of February 6, 2024, the undersigned has received no answer, objection or other responsive pleading to the Movant's Motion for Relief from Stay.

The undersigned further certifies that I have reviewed the Court's docket in this case and no answer, objection or other responsive pleading to the Movant's Motion for Relief from Stay. Pursuant to the Notice of Motion, objections to the Movant's Motion were to be filed and served before January 17, 2024.

It is hereby respectfully requested that the Order attached to the Motion be entered at the earliest convenience of the Court.

Dated: February 8, 2024

Respectfully submitted,

Brock & Scott, PLLC

/s/*Mario Hanyon*  
Andrew Spivack, PA Bar No. 84439  
Matthew Fissel, PA Bar No. 314567  
Mario Hanyon, PA Bar No. 203993  
Ryan Starks, PA Bar No. 330002  
Jay Jones, PA Bar No. 86657  
Attorney for Creditor

BROCK & SCOTT, PLLC

3825 Forrestgate Drive

Winston Salem, NC 27103

Telephone: (844) 856-6646

Facsimile: (704) 369-0760

E-Mail: PABKR@brockandscott.com

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

<b>In Re:</b>	:
<b>ANDREW H. HON,</b>	: Bankruptcy No. 23-12550-amc
<b>Debtor</b>	: Chapter 13
<b>Freedom Mortgage Corporation</b>	:
<b>Movant</b>	:
	:
<b>v.</b>	:
<b>ANDREW H. HON</b>	: 11 U.S.C. §362

and  
**KENNETH E WEST, ESQUIRE (TRUSTEE)**

**Respondent(s) :**

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and exact copy of the foregoing Certification of No Answer has been electronically served or mailed, postage prepaid on February 10, 2024 to the following:

ANDREW H. HON  
1242 E MOYAMENSING AVE  
PHILADELPHIA, PA 19147-5314

MICHAEL I. ASSAD, Debtor's Attorney  
1500 Walnut St  
Ste 900  
Philadelphia, PA 19102  
mail@cibiklaw.com

KENNETH E WEST, Bankruptcy Trustee  
1234 Market Street - Suite 1813  
Philadelphia, PA 19107

Office of United States Trustee, US Trustee  
Robert N.C. Nix Federal Building  
900 Market Street, Suite 320  
Philadelphia, PA 19107

*/s/Mario Hanyon*  
Andrew Spivack, PA Bar No. 84439  
Matthew Fissel, PA Bar No. 314567  
Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

Jay Jones, PA Bar No. 86657

Attorney for Creditor

BROCK & SCOTT, PLLC

3825 Forrestgate Drive

Winston Salem, NC 27103

Telephone: (844) 856-6646

Faxsimile: (704) 369-0760

E-Mail: PABKR@brockandscott.com